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**VIA FACSIMILE AND  
FIRST CLASS MAIL**

George Borden, Esq.  
Williams & Connolly, LLP  
725 Twelfth Street, N.W.  
Washington, D.C. 20005

RE: Russian Research Center Kurchatov Institute v.  
v. Western Services Corp., et al.  
Civil Action No.: AMD 02-3878

Dear George:

This will follow up our telephone discussion of earlier today.

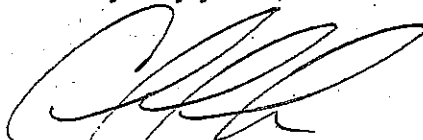
GSE requests that WSC provide immediate dates to inspect the documents that Ms. Sagerson has advised that WSC is now willing to produce in light of the motion to compel. I have offered Tuesday, November 25 as a possible option.

GSE requests that WSC provide dates for the resumption of George Utmel's deposition.

You advised that WSC will not agree to permit WSC's expert report to be provided to even a limited number of GSE's or KI's client representatives. This position is unreasonable because the expert report forms the basis of WSC's monetary damages claim against GSE and KI. I have offered to make the report subject to paragraph 10 of the protective order but WSC has rejected even this approach. It appears that GSE is left with no option but to seek the Court's assistance on this issue.

Finally, I inquired whether WSC had taken a position on the issues raised in my November 20 letter to Mr. Genderson. You advised that you were unaware of whether a position had been taken but would check with the appropriate persons. Those issues are time sensitive in that Mr. Barkovskiy's deposition is set to begin on December 2.

Very truly yours,



Charles L. Simmons Jr., P.C.